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Attorneys for Plaintiff
United States of America

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. EDUARDO BARAJAS (1), aka Eddie-Boy, VICTOR RAMOS (2), aka V, ALEJANDRO VELARDE (3), aka Lil' Al, MIGUEL RIVERA MEDINA (4) aka Vampiro, JACOB TALLAECHE (5) aka Dopey, THOMAS ALEJANDRO MANZANO (6), aka Tommy-Boy, DERIC WILLIAMS (7), aka Pelon, JULIO CESAR JIMENEZ (8), aka Foo-Foo, ERNESTO ROMAN LOPEZ (9), aka Ernie, Defendants.	Criminal Case No. 07CR2985-WQH JOINT MOTION FOR A PROTECTIVE ORDER

The parties, United States of America, by and through its counsel KAREN P. HEWITT, United States Attorney, and MICHAEL J. CROWLEY and TIMOTHY F. SALEL, Assistant United States Attorneys, and the above-listed defendants, through their respective defense counsel, hereby jointly move, pursuant to Rule 16(d) of the Federal Rules of Criminal Procedure, for this Court to enter a protective order in order to prevent premature and unwarranted disclosure of evidence to potential targets, subjects, witnesses, and unrelated third parties,

The parties jointly move and agree that the defendants, their counsel of record, and their paralegals, law clerks, secretaries, experts, investigators, assistants, office personnel and employees shall not disclose the substance of any discovery material received from the Government in the above-captioned matter, including all wiretap documents, to any third party, unless such material is already a matter of public record, without prior approval of this Court;

The parties further move and agree that the United States Attorney and the Assistant United States Attorneys assigned to this case (hereafter collectively referred to as "the Government") and their assistants, the defendants, their counsel and their assistants, shall not disclose the substance of any discovery material produced to the defendants or obtained by the Government from the defendants, unless such material is already a matter of public record, to representatives of the media or other third parties not involved in any way in the investigation or prosecution of the case.

The parties further move and agree that nothing contained herein shall prevent the Government, or any defendant or their counsel, from disclosing such discovery material to any other attorneys working for the Government, the defendants or their counsel, government agents (federal, state or local), paralegals, law clerks, secretaries, experts, investigators, assistants, office personnel, employees , and any other person who is working for the Government or the defendants and their counsel (collectively referred to as "assistants") in the investigation or preparation of this case or, with respect to the Government and its assistants only, in other criminal investigations, without prior court order. Further, nothing contained herein shall preclude the Government, defendants or their counsel, or their respective assistants from conducting an investigation of the facts of this case on behalf of the Government or said defendants, or with respect to the Government and its assistants only, from conducting an investigation of other criminal activity, including interviewing witnesses disclosed by said discovery materials, or from taking statements from witnesses disclosed by said discovery materials, or from asking said witnesses if they themselves have made prior statements to the Government that are disclosed in the discovery materials, and about the contents of such statements. In connection with any such investigation, it shall not be necessary that the Government, the defendants or their counsel, or their respective assistants, obtain prior permission of this Court.

The parties jointly move and agree that, should counsel withdraw or be disqualified from participation in this case, any material received and any copies derived therefrom, shall be returned to the Government within 10 days.

Finally, the parties jointly move and agree that each counsel shall be required to communicate the substance of this order and explain it to their clients and assistants before disclosing the substance of the discovery to their clients or assistants.

Respectfully submitted,

KAREN P. HEWITT
United States Attorney

DATED: January 30, 2008

/S/ MICHAEL J. CROWLEY
MICHAEL J. CROWLEY
Assistant U.S. Attorney

DATED: January 30, 2008

/S/ TIMOTHY F. SALEL
TIMOTHY F. SALEL
Assistant U.S. Attorney

DATED: January 30, 2008

/S/ STEPHEN P. WHITE
STEPHEN P. WHITE
Attorney for Eduardo Barajas (1)

DATED: January 30, 2008

/S/ MARK F. ADAMS
MARK F. ADAMS
Attorney for Victor Ramos (2)

DATED: January 30, 2008

/S/ LYNN H. BALL
LYNN H. BALL
Attorney for Alejandro Velarde (3)

DATED: January 30, 2008

/S/ ROBERT E. BOYCE
ROBERT E. BOYCE
Attorney for Miguel Rivera Medina (4)

DATED: January 30, 2008

/S/ JAMES W. GLEAVE
JAMES W. GLEAVE
Attorney for Jacob Tallaeche (5)

DATED: January 30, 2008

/S/ NANCY B. ROSENFELD
NANCY B. ROSENFELD
Attorney for Thomas A. Manzano (6)

DATED: January 30, 2008

/S/ ANTHONY E. COLOMBO, JR.
ANTHONY E. COLOMBO, JR.
Attorney for Deric Williams (7)

DATED: January 30, 2008

/S/ CHARLES N. GUTHRIE
CHARLES N. GUTHRIE
Attorney for Julio Cesar Jimenez (8)

DATED: January 30, 2008

/S/ HOWARD B. FRANK
HOWARD B. FRANK
Attorney for Ernest Roman Lopez (9)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA, Plaintiff, v. EDUARDO BARAJAS, et al., Defendants.	Criminal Case No. 07CR2985-WQH CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that:

I, Timothy F. Salel, am a citizen of the United States over the age of 18 years and a resident of San Diego County, CA; our business address is 880 Front Street, San Diego, CA 92101-8893; I am not a party to the above-entitled action.

I have caused service of JOINT MOTION TO DECLARE CASE COMPLEX, on the following parties, by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically notifies the following parties at their respective e-mail addresses:

(1) STEPHEN P. WHITE – Attorney for Eduardo Barajas (1)
E-Mail: spw1@sbcglobal.net

(2) MARK F. ADAMS – Attorney for Victor Ramos (2)
E-Mail: markadamsesq@yahoo.com

(3) LYNN H. BALL – Attorney for Alejandro Velarde (3)
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(4) ROBERT E. BOYCE – Attorney for Miguel Rivera Medina (4)
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(5) JAMES W. GLEAVE – Attorney for Jacob Tallaeche (5)
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(8) CHARLES N. GUTHRIE – Attorney for Julio Cesar Jimenez (8)
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(9) HOWARD B. FRANK – Attorney for Ernesto Roman Lopez (9)
E-Mail: hbfandjm@aol.com

I declare under penalty of perjury that the foregoing is true and correct.

DATED: January 30, 2008

/S/ TIMOTHY F. SALEL
TIMOTHY F. SALEL
Assistant U.S. Attorney